

Alaska Educational Radio System (AERS) is licensee of 3 NCE stations, and wishes to expand its coverage within Alaska. AERS suggests a limit of Five (5) applications per entity. Some have suggested a higher limit. Some have argued that the limit be lifted as this may be the, "last opportunity to apply for a new NCE station."

There is no basis for a belief that this NCE window will be the last. AERS suggests that the lower the limit, the more rapidly FCC staff can process the applications, grant permits to construct, open a new window. As the limit is raised, so is the risk that applications will be mutually exclusive, the higher the proportion of applications will result in mutual exclusivity, with more processing of legal conflicts, with greater delay in the granting of permits and activation of new stations. A lower limit has greater benefit to the public as on air facilities will be constructed much more rapidly as the possibility of conflict is reduced.

Increasing the limit decreases media diversity. Increasing the limit gives larger organizations greater opportunity to "grab spectrum", as they are better positioned to spend funds, higher experts, and engineers. Smaller organizations are less able to compete as the number of allowed applications is raised. Lower caps will result in more media diversity.

In the past LPTV windows had a cap of 5, which resulted in many singleton applications that were rapidly processed, granted, and constructed. Thusm we suggest a limit of five.

For this reason AERS recommends a lower limit.

Signed
Jeremy Lansman
For AERS